

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

CYNTHIA WILDER,)	CIVIL ACTION NO.:
)	
Plaintiff,)	1:09-CV-2039-JOF
)	
v.)	
)	
)	
MIDLAND CREDIT MANAGEMENT,)	
)	
Defendant.)	
<hr style="width: 40%; margin-left: 0;"/>)	

DECLARATION OF JOHN H. BEDARD, JR.

I, John H. Bedard, Jr., as an officer of this Court do hereby state in my place as lead counsel of record for Defendant Midland Credit Management, Inc. as follows:

1.

My name is John H. Bedard, Jr. I am lead counsel for Defendant Midland Credit Management, Inc. in the above referenced action. I am over 18 years of age and am competent to testify to the statements set forth in this Declaration. This declaration is based upon my own personal knowledge and if called upon to testify, the content of this declaration would be my testimony as to the things stated herein.

2.

On November 18, 2009, I sent Cynthia Wilder, via her counsel of record, written correspondence demanding that Mr. Wilder's claims be adjudicated via arbitration and invoking the terms of Ms. Wilder's arbitration agreement.

3.

Attached hereto as Exhibit "A" is a true and correct copy of the arbitration demand I sent to counsel.

Dated this 4th day of January, 2010.

/s/John H. Bedard, Jr.
John H. Bedard, Jr.
Georgia Bar No. 043473

EXHIBIT

“A”



John H. Bedard, Jr.
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November 18, 2009

Alexander Simanovsky
Alex Simanovsky & Associates
2300 Henderson Mill road, Suite 30
Atlanta, Georgia 30345

RE: Cynthia Wilder v. Midland Credit Management, Inc.
USDC-NDGA 1:09-cv-2039-JOF

Dear Alex:

Midland Credit Management is electing to proceed with arbitration in the above indicated matter pursuant to the Arbitration Rider contained in Ms. Wilder's loan agreement. Please advise as to whether you will consent to move forward with arbitration (thus staying all further proceedings in the federal court) and we will prepare a consent order and send it to you for your approval. Please do not hesitate to contact me with any questions you may have.

Thank you for your courtesy.

Very truly yours,

John H. Bedard, Jr. (mes)
John H. Bedard, Jr.